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Attorneys for Plaintiffs and the Class

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

BUCKEYE TREE LODGE AND SEQUOIA
VILLAGE INN, LLC, a California limited
liability company, 2020 O STREET
CORPORATION, INC, D/B/A THE MANSION
ON O STREET, PROSPECT HISTORIC
HOTEL, and SHILOH MORNING INN, LLC, a
Oklahoma limited liability company,
individually and on behalf of themselves and all
others similarly situated,

Plaintiffs,

vs.

EXPEDIA, INC., a Washington corporation;
HOTELS.COM, L.P., a Texas limited
partnership; HOTELS.COM GP, LLC, a Texas
limited liability company; ORBITZ, LLC, a
Delaware limited liability company,

Defendants.

Case No. 3:16-cv-04721-VC

CLASS ACTION

**DECLARATION OF FRED WICKMAN IN
SUPPORT OF PLAINTIFFS' UNOPPOSED
MOTION FOR APPROVAL OF CLASS ACTION
SETTLEMENT, ATTORNEY'S FEES AND
COSTS, AND INCENTIVE AWARDS**

Date: March 25, 2021
Time: 2:00 p.m.
Courtroom: 4, 17th Floor
Judge: Hon. Vince Chhabria

1 I, Fred Wickman, declare as follows:

2 1. I am the owner of Plaintiff Prospect Historic Hotel. I make this declaration in support of
3 Plaintiffs' Unopposed Motion for Approval of Class Action Settlement. If called as a witness, I would
4 and could testify to the following:

5 2. Prospect Historic Hotel is located 28 miles from Crater Lake National Park. It is a small
6 inn that I run with my wife, Karen Wickman.

7 3. As a Class Representative, I have been very involved in my case against Expedia since I
8 became a plaintiff in 2018. I assisted Class Counsel's investigation by discussing my experiences with
9 Expedia's false advertisements about the Inn's availability, as well as my perception and understanding
10 of the effect of those advertisements on my business and my customers.

11 4. Since I became involved with this action, I regularly spoke with my counsel to stay
12 informed of the status of my case and to discuss the next steps.

13 5. I worked with Class Counsel on my discovery requests. I looked for documents and
14 provided them to Class Counsel.

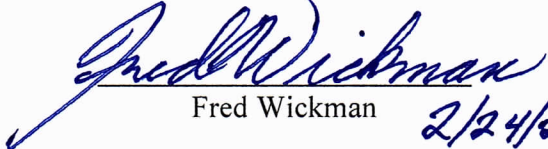
15 6. I met with Class Counsel to prepare for my deposition, which I attended on October 3,
16 2018. I faced questioning about the Inn's availability, my experiences with Expedia and similar websites,
17 and the false unavailability messages about our Inn that appeared on Expedia's websites.

18 7. I communicated with Class Counsel regarding settlement throughout the litigation and in
19 connection with the two mediations and the settlement conference. I have always had the best interests of
20 the Class in mind when considering whether to resolve this action. Since I knew it was important to
21 fulfill my obligation to Class Members, I evaluated the benefits of the settlement—the injunction that
22 will stop Expedia from making false statements about Class Members' availability—to make sure the
23 settlement was fair to the Class Members I represent.

24 8. I reviewed and submitted declarations in support of class certification and in support of
25 settlement approval.

26 9. I have devoted substantial time to litigate this action to seek a change in Expedia's
27 advertising practices. I believe that my dedication and effort have conferred a significant benefit on other
28 Class Members and on consumers.

1 I declare under penalty of perjury under the law of the State of California that the foregoing is
2 true and correct. Executed on February 24, 2021 in Prospect, Oregon.

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5 Fred Wickman 2/24/21
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